

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

Civil Action, Case No. 07 CIV. 2863 (US)(LMS)

RALPH ROMEO and KIRA MILO)	ECF CASE
)	
)	INITIAL DISCLOSURE STATEMENT
Plaintiffs,)	OF DEFENDANT MOHAMMED
)	
-against-)	
)	
JOHN E. ANDRUS MEMORIAL, INC. and)	
OLIVE MOHAMMED, Individually,)	
)	
Defendants.)	
)	

TO: Jonathan Lovett, Esq. (JL-4854)
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River Edge, NJ 07661

SIRS:

In accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant Olive Mohammed ("Mohammed") hereby provides her initial disclosures. In making these disclosures, Mohammed states that these disclosures are based upon information reasonably available as at the date hereof and are made without waiving any objection(s) as to the relevancy, materiality and/or admissibility of evidence in this action and/or any other action or proceeding. Mohammed has not yet completed her investigation of the facts and circumstances of and relating to this action, nor has she completed discovery or preparation for trial. Mohammed reserves the right to revise, correct, add to and/or clarify the disclosures herein set forth.

- A. **The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information:**

Ralph Romeo
Kira Milo
Sharon Sauvino
Patricia Constantine
Laura Frobel
Sandra Sindaco
Grace Aronne
Lauren Reinertsen
Betsy Biddle
Angela Thornton
Dorian Samuels
Enid Heath
Freddy Jackson
Myrtle Simpson
June Treston
Donnette Weatherburn
Alcozy Payno-Gamble
Yvette McDonald
Mariana Register

- B. **A description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment:**

Mohammed is in the process of gathering such documents, data compilations and/or such tangible things, and shall do so by appropriate discovery herein.

- C. **A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:**

Mohammed is unable at present to prepare such a computation of such damages, and does not have at present any such documents or other evidentiary material.

- D. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment:

Mohammed does not have any such insurance agreement.

The foregoing statements are made in compliance with the Federal Rules of Civil Procedure, and are not meant nor should they be construed to mean or constitute a waiver of any claim of or to any attorney-client privilege or attorney work product, or any other privilege accorded by law. The foregoing listing(s) are not to be considered conclusive, and Mohammed reserves the right to supplement the information herein contained as this matter proceeds through investigation and discovery.

Dated: June 27, 2007

SINGER NETTER DOWD & BERMAN
Attorneys for Defendant Olive Mohammed

By:



Edward M. Berman (EB-5385)
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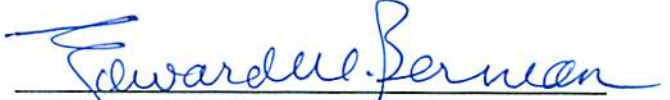
DECLARATION OF SERVICE

I, the undersigned, hereby certify that on June 27, 2007, I caused the Initial Disclosure Statement of Defendant Olive Mohammed to be served upon the respective attorneys for Plaintiffs and Defendant John E. Andrus Memorial, Inc. at their following addresses:

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River Edge, NJ 07661

Dated: White Plains, New York
June 27, 2007



Edward M. Berman (EB-5385)